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USDOC FOR OEA/532/M. NICKSON / JAY HATFIELD  
USDOC FOR 3132/USFCS/OIO/EAP RD/BILL ZARIT  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A  
TAGS: [BMGT](#) [BEXP](#) [ETRD](#) [ETTC](#) [HK](#) [SG](#)

SUBJECT: RSVP: EXTRANCHECK:  
PRE-LICENSE CHECK: ENGINEERING SOURCE INTERNATIONAL PTE LTD MEIBAN  
MOLD MANUFACTURE PTE LTD APPLICATION NUMBER: D396138

REF. USDOC 023751

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. Application Number: D396138 ; Attention: OEA/532/M. Nickson / Jay Hatfield - License Applicant: Carbone of America, Graphite Material Division, 215 Stackpole Street, St. Mary's, PA 15857-1488, Contact: Ms. Roberta Y Dippold (814-781 8521).

¶3. On Thursday, June 12 - 2008, CommAttache Todd Avery and CommSpec CHAN Y K visited Meiban Mold Manufacture Pte Ltd located at Meiban Industrial Building, 11 Ubi Road 1, Lobby B Level 3, Singapore ¶139965. Emboffs met with Mr. LAU O S (Asst. General Manager - Tel: 65-6846 2856 ; Fax: 65-6842 7655) and Mr. LEE Y P (Operation Manager - Tel: 65-6846 2819 ; Fax: 65-6842 2926) to brief them on U.S. export licensing procedures and requirements.

¶4. From the interview, Emboffs established that Meiban, a contract manufacturing company and mold maker for the plastics industry, had no knowledge of the license applicant, the ultimate consignee or the specified order. Meiban stated that they do order graphite similar to that identified in the license application for their Electrical Discharge Machining (EDM) process from local distributors or from Japan but not in such large quantities. To support their claim that they obtained their graphite material from Japan instead of the license applicant, Meiban provided copies of graphite orders from local and Japanese suppliers. Mr. Lau indicated that the quantity on the license would last Meiban 'a few years' at their current capacity. According to Meiban, they typically use copper for their EDM process unless large parts are being machined. They indicated that graphite is lighter and cheaper than copper, but not as effective for smaller parts.

¶5. Meiban (with more than 5000 staff world wide) clarified that though they have Japanese shareholders, they are a Singapore company with a Singaporean CEO. Meiban showed Emboffs their shop floor and tool room where they produce parts for various MNCs such as HP, Oakley and Dyson.

¶6. Emboffs also visited the address of ultimate consignee Engineering Source International Pte Ltd (ESI) at Blk 3015 Ubi Road 1 #04-256, Singapore 408704, to discover that the company owning the premises was Meng Hoi Precision Pte Ltd who was renting a small space to ESI. No one from ESI was there and Meng Hoi assisted Emboffs in contacting Mr. James SEOW who suggested that Emboffs meet him at his new office location in the Woodlands.

¶7. On Friday, June 13 - 2008, CommAttache Todd Avery and CommSpec CHAN Y K visited ESI's new office located at Blk 20 Woodlands Link #09-34, Woodlands East Industrial Estate, Singapore 738733. Emboffs

met with Mr. James SEOW (General Manager - Tel / Fax: 65-6583 3276 ; Mobile: 65-9368 3443) to brief him on U.S. export licensing procedures and requirements.

¶18. ESI's office is located on the ninth floor in a typical Singapore industrial complex close to several plastic manufacturers. The premises, which was under renovation, consisted of a small office area and larger storage/shop. There are two entrances to the premises.

¶19. From the interview, Emboffs confirmed that ESI was established in early 2008 and is the authorized distributor for Carbone of America in Singapore, Malaysia and Indonesia. Mr. Seow shared ESI's business plan and business registration with Emboffs. Shareholders of ESI are Ms. Sharon Lucile from Oklahoma (70%), whose husband, Mr. Charles Turner, previously worked at Poco Graphite in Singapore and Mr. Seow's wife (30%). Mr. Seow is the sole employee of ESI.

¶10. Both Mr. Turner and Mr. Seow have several years mold making and tooling experience. Mr. Seow stated that he was hired by Mr. Turner to work at Poco Graphite from 2002 - 2005 after which he worked for Graphite Carbon Technology Pte Ltd from 2005 until he left to set up ESI. Mr. Seow's previous employer, Graphite Carbon Technology, is a supplier of graphite material from Japan to Meiban. Mr. Seow also indicated that he currently has an import license for tooling equipment but will be checking if it can also be used for the graphite material.

¶11. ESI clarified that they do not have any orders for the material identified in the license application and have not started marketing the new material in the region. However, ESI feels that the quantity of material in the license application is equivalent to six months stock based on their estimates of overall market in

Singapore, Malaysia and Indonesia. Mr. Seow indicated that he is well aware of U.S. export licensing procedures and requirements and that securing the export license for the graphite material is key to the success of his new company.

¶12. On the basis of the inspections and the interviews conducted, Emboffs are satisfied that Meiban is a legitimate business concern that purchases and uses material similar to that in the license application for legitimate commercial purposes. Emboffs are also satisfied that ESI is also a legitimate business concern seeking to import the controlled commodity for legitimate business purposes, but is not yet a supplier to the end-user identified in the export license.

(FCSN: CHAN Y K)

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